



Consultation, IA &lt;consultation@bia.gov&gt;

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**JaNella W.** <cohariegurl@hotmail.com>  
To: "consultation@bia.gov" <consultation@bia.gov>  
Cc: Greg Jacobs <greg\_jacobs53@yahoo.com>

Wed, Aug 14, 2013 at 12:45 PM

Please find a letter attached to this email from the Coharie Intra-Tribal Council, Inc. Tribal Administrator Gregory D. Jacobs, in reference to the Discussion Draft on Part 83 Procedures.

Thank you and Have a Great Day!

***Enjoy This Day!!!!***

*Always,*  
**JaNella Williams**

When the Power of Love overcomes the Love of Power, then the world will know PEACE!

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**Federal Acknowledgment Process ltr..docx**  
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Date: August 13, 2013

To: Elizabeth Appel, Office of Regulatory Affairs and Collaborative Action

From: Greg Jacobs, Coharie Intra-Tribal Council, Inc. Tribal Administrator

Re: Discussion Draft on Part 83 Procedures for Establishing that an American Indian Group Exists as an Indian Tribe

To Whom It May Concern:

The purpose of this memo is to outline the comments on the above referenced document. The comments of the Coharie Tribe are outlined within this memo in reference to the Draft of Part 83 Procedures.

We feel it only appropriate to thank the Bureau of Indian Affairs (BIA) and many countless other individuals on their efforts to address the numerous concerns regarding the Federal Acknowledgment Process (25 CFR Part 83; FAP).

The deletion of criterion 83.7a, which required petitioners to provide external evidence that identifies the petitioner as an Indian entity, would be very helpful because of the historical prejudices that existed on the east coast, which made it very difficult for tribes to be able to provide evidence to satisfy this criteria.

Our comment on the definition of continuously or continuous as extending from 1934 to the present would be a fair position for the majority of the Eastern Tribes regardless of where they may be located.

The proposed changes to the mandatory criteria would benefit all petitioners in preparing comprehensive documented petitions for Federal Acknowledgment. These changes provide a clear understanding of the evidence required to meet the seven mandatory criteria.

The Preliminary Discussion Draft is successful in making the process more understandable and includes language that clarifies key terms and clarifies the evidence necessary to satisfy the mandatory criteria. 83.7e requiring demonstration of descent from an historical tribe, most east coast tribes find that to be hard to meet due to the level of evidence required by Office of Federal Acknowledgment (OFA). Due to the fact that contact was earlier than western tribes and many records were destroyed. Therefore, criteria 83.7e did not have sufficient changes within the criteria to reflect the original intent of the acknowledgment regulations, and eliminate the burden on petitioners to satisfy 83.7e.

We believe this is a great step in eliminating problems with the Federal Acknowledgment Process, and we commend the work that has been done to make the process more efficient, flexible, and timely.

Thank you again for reviewing and revising the Federal Acknowledgment Process.

Sincerely,  
Greg Jacobs, CITCI-TA